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August 14, 2007

Mr. Robert J. Harris Regional Manager, Upper Great Plains Region Western Area Power Administration 2900 4th Ave. North Billings, MT 59101-1266

Subject: Post-2009 Resource Pool Proposal

Dear Mr. Harris:

On behalf of the more than 400,000 Montanans served by electric cooperatives in Montana, many of whom receive their power from Western, I am writing to comment on implementation of the next Resource Pool.

Our association urges that WAPA follow the same polices and procedures of prior Resource Pools. In implementing the new Resource Pool, we believe Western should focus on allocations to preference eligible utilities in amounts sufficient to be meaningful to new firm power customers. Providing small allocations will not provide sufficient benefit to new customers and will work a hardship on existing firm power customers whose allocations have been reduced by Resource Pool withdrawals.

We also urge that Western act within existing laws and regulations in making allocations from the Resource Pool. We oppose any use by Western of "appropriate purposes" to attempt to expand existing laws and policy on eligibility requirements for receiving firm power allocations of federal power.

Finally, we ask that terms and conditions of contracts for new customers be identical to terms and conditions of existing firm power customers. If withdrawals are made in the future, reductions should apply to all firm power customers.

Thank you for your kind consideration of our comments.

Wheel Best Regards,

Dave Wheelihan

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